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Attorneys for Plaintiff
VITALE AML CONSULTANTS, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
VITALE AML CONSULTANTS, INC.,	:	
	:	
Plaintiff,	:	
v.	:	
	:	No. 08-CV-1315 (RMB)
PROMONTORY FINANCIAL GROUP, LLC;	:	
PROMONTORY FORENSIC SOLUTIONS, LLC;	:	
HANI SAMAAN; PROMINENT IT SOLUTIONS,	:	
INC.; RONALD ROSE; AML CONSULTING	:	
SERVICES, INC.; and JOHN DOES (1-10),	:	
	:	
Defendants.	:	
-----X	:	

PLAINTIFF VITALE AML CONSULTANTS, INC.'S RULE 26(a)(1) DISCLOSURES

Plaintiff Vitale AML Consultants, Inc. hereby submits its Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. The information disclosed herein represents only that information currently known and available to Plaintiff following a reasonable and diligent investigation. The information disclosed herein does not preclude Plaintiff from later identifying additional individuals likely to have discoverable information or additional relevant documents discovered after further investigation or discovery conducted after this Initial

Disclosure. Plaintiff reserves the right to supplement or to revise this Initial Disclosure as permitted under federal or local rules.

A. Individuals Likely To Have Discoverable Information.

Anne T. Vitale
President
Vitale AML Consultants, Inc.
1120 Avenue of the Americas, 4th Floor
New York, NY 10036
(212) 626-6732

Ms. Vitale is the President of Vitale AML Consultants, Inc (“Vitale AML”). As such, she may have knowledge regarding the contractual relationships between Vitale AML and the Rose and Samaan Defendants, as well as Vitale AML’s confidential and proprietary information and computer programs.

Thomas Paulantonio
P.O. Box 1109
Waterford, CT 06385
(860) 287-7700

Mr. Paulantonio is an independent contractor for Vitale AML. As such, he may have knowledge regarding Vitale AML’s confidential and proprietary information and computer programs and Vitale AML’s relationship with the Samaan and Rose Defendants.

Moyosola O. Mobolade
Vitale AML Consultants, Inc.
1120 Avenue of the Americas, 4th Floor
New York, NY 10036
(212) 626-6732

Ms. Mobolade is an employee of Vitale AML. As such, she may have information regarding Vitale AML’s confidential and proprietary information and computer programs and Vitale AML’s relationship with the Samaan Defendants.

Peter Fiddler
Linda Pan
WCA Technologies, Inc.
8 W. 38th Street, Suite 1004
New York, NY 10018

Mr. Fiddler is the President of and Ms. Pan is an employee of WCA Technologies, Inc., which supports Vitale AML's computer programs. As such, they may have information regarding Vitale AML's confidential and proprietary information and computer programs and Vitale AML's relationship with the Samaan Defendants.

Mark Eberle, Esq.
90 Broad Street
25th Floor
New York, NY 10004
(212) 233-4185

Mr. Eberle is an attorney who has represented Vitale AML. Mr. Eberle may have information regarding statements by the Samaan Defendants concerning their relationship with Vitale AML.

Paulette Belair
88-72 78th Avenue
Glendale, NY 11385
(917) 282-7145

Ms. Belair was Compliance Officer at Union Bank of California International and may have information regarding Vitale AML's development of case management systems and Vitale AML's relationship with the Rose and Samaan Defendants.

To the extent that Defendants wish to contact any of the individuals listed above who are or have been employed or retained by Plaintiff, Defendants are directed to contact the undersigned counsel.

B. Documents.

The following documents that may be used to support Plaintiff's claims or defenses are currently located at Plaintiff's corporate office located at 1120 Avenue of the Americas, 4th Floor, New York, New York 10036: correspondence, electronic computer software code, consulting and confidentiality agreements, invoices, and financial records.

The following documents that may be used to support Plaintiff's claims or defenses are currently located at the office of WCA Technologies, Inc., located at 8 W. 38th Street, Suite 1004, New York, New York 10018: electronic computer software code.

C. Computation of Damages.

As set forth in Vitale AML's Complaint, Vitale AML seeks actual compensatory and liquidated damages, restitution, unjust enrichment, punitive damages, and attorneys' fees and costs in addition to injunctive relief. Vitale AML will seek and produce documents regarding these categories of damages as part of discovery pursuant to Federal Rule of Civil Procedure 34, but at present has an insufficient basis to provide estimates for these categories of damages prior to beginning discovery.

D. Insurance Agreements.

Plaintiff is unaware of any applicable insurance agreements.

Dated: New York, New York
April 2, 2008

O'MELVENY & MYERS LLP

By: 

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Attorneys for Plaintiff

VITALE AML CONSULTANTS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this, the 2nd day of April, 2008, I sent a copy of the foregoing Rule 26(a)(1) Disclosures by Vitale AML Consultants, Inc. by electronic mail to:

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A handwritten signature in black ink, appearing to read "Rhett O. Millsaps II", written over a horizontal line.

Rhett O. Millsaps II